

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**CURLING PLAINTIFFS' REQUEST FOR ORAL ARGUMENT AND  
STATUS CONFERENCE**

Pursuant to Local Rule 7.1(E) and this Court's Standing Order (Dkt. No. 11 ¶ III(k)), Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the "Curling Plaintiffs"), respectfully request oral argument on Plaintiffs' Joint Motion for Sanctions (Dkt. No. 623), and State Defendants' Motion to Dismiss Curling Plaintiffs' Third Amended Complaint (Dkt. No. 645). With respect to Plaintiffs' Joint Motion for Sanctions, Curling Plaintiffs respectfully submit that oral argument, at this Court's earliest convenience, will assist the Court in understanding the actual facts regarding Defendants' conduct at issue in the Motion and determining the appropriate scope of sanctions. With respect to State Defendants' Motion to Dismiss, given the importance of the electoral issues involved in this case, and the need to proceed expeditiously with discovery and a

final hearing on the merits, Curling Plaintiffs respectfully submit that oral argument, at this Court's earliest convenience, will assist the Court in resolving State Defendants' Motion and enable the Court and the parties to move this case forward expeditiously. In addition, the lawyer (or lawyers) who will be chiefly responsible for oral argument on behalf of Curling Plaintiffs, if allowed, will be an associate with no more than seven years of experience.

Curling Plaintiffs also request a status conference with the Court at its earliest convenience to address the schedule for and scope of a hearing on Curling Plaintiffs' Motion for Preliminary Injunction (Dkt. No. 619), and the scope of and schedule for expedited discovery before a hearing on that Motion as well as an overall schedule to resolve the claims in Curling Plaintiffs' Third Amended Complaint (Dkt. No. 627).

Dated: November 15, 2019

Respectfully submitted,

/s/ David D. Cross

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross

David D. Cross

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 15, 2019, a copy of the foregoing **CURLING PLAINTIFFS' REQUEST FOR ORAL ARGUMENT AND STATUS CONFERENCE** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross  
David D. Cross